August 27, 1997

Mr. Michael Sewell
Air Quality Engineer
Monterey Bay Unified Air
Pollution Control District
24580 Silver Cloud Court
Monterey, CA 93940

Dear Mr. Sewell,

Thank you for the opportunity to review the proposed Title V permit for the Aera Energy LLC crude oil production facility. The permit conditions, periodic monitoring, record keeping and reporting requirements are thorough and will assure compliance with all applicable requirements.

I appreciate the opportunities EPA has had to discuss most of the issues and questions regarding this proposed permit over the phone over the last few weeks. Attached is a brief comment document that lists a few remaining issues that should be addressed in the Aera permit.

Please do not hesitate to call me or Paul Carroll of my staff at (415) 744-1148 if you have any questions.

Sincerely,

Matt Haber
Chief, Permits Office
Air Division
U.S. EPA, Region 9

AERA Energy LLC Comments

Rule 412

As we discussed over the phone on August 14, 1997, the state law requirement that diesel fuel contain less than 0.5% sulfur content is not an adequate justification for assuring compliance with this requirement. There are exceptions to the state law, and therefore it is possible that diesel fuel that does not meet the sulfur content limit may be acquired and used by the source. Thus, the permit must contain a requirement that all Diesel No. 6 fuel used at this unit be certified to contain no more the 0.5% sulfur content by weight. Consistent with this need, permit condition 47 should be rewritten to delete "(except diesel)" so that this exception to fuel testing is removed. Alternatively, certification by the manufacturer as to the sulfur content of the diesel fuel is sufficient.

Condition 55 contains a typographical error. This monitoring provision applies to permit conditions 25 and 26, not 24 and 25. Please revise this condition.

Condition 28 covers VOC emissions from architectural coatings (District Rule 426). However, no reporting or record keeping is required by the rule, and there is no provision for it in the permit. Although EPA recognizes that the rule is primarily a manufacturing and sale restriction, the source shares responsibility in ensuring that it purchases and uses products that comply with the rule. Therefore, the permit should contain a provision for recording architectural coatings bought and applied. Although California has a state law which assures compliance with the rule, coatings may be purchased from other states. Thus, we suggest the following language:

> PG&E will keep records of all architectural coatings purchased that are not clearly labelled as complying with the VOC content limits contained in Rule 426. Compliance in these cases can be assured by maintaining records of manufacturer's certifications or by Material Data Safety Sheets (MSDS) that demonstrate compliance with the VOC limits of Rule 426.

Condition 38 requires that a Risk Management Plan be submitted in accordance with 40 CFR Part 68. However, it does not specify to whom the RMP be submitted. Please specify in the condition that the RMP be submitted to the U.S. EPA.